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REMARKS

In the Office Action dated March 1, 2005, claims 1-20 are pending. Claims 1, 6, 17, and 20 are independent claims from which all other claims depend therefrom. Claims 4, 6, 9, and 17 are herein amended. Claims 4, 6, 9, and 17 have not been amended for patentability reasons.

The Office Action states that the specification is objected to because the title of the invention is not descriptive. The title of the specification is herein amended to include the terms suggested in the Office Action.

Claims 1-20 stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. The Office Action states that the claims contain subject matter, which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. Applicants, respectfully, traverse and submit that the subject matter presented in all of the claims in clearly contained in the specification of the present application and is presented in such a way as to enable one skilled in the art to which it pertains.

Referring to MPEP 2164.04, the examiner has the initial burden to establish a reasonable basis to question the enablement provided for the claimed invention. *In re Wright*, 999 F.2d 1557, 1562, 27 USPQ2d 1510, 1513 (Fed. Cir. 1993). As stated by the court, "it is incumbent upon the Patent Office, whenever a rejection on this basis is made, to explain why it doubts the truth or accuracy of any statement in a supporting disclosure and to back up any assertions of its own with acceptable evidence or reasoning which is inconsistent with the contested statement. Otherwise, there would be no need for the applicant to go to the trouble and expense of supporting his presumptively accurate disclosure." *In re Marzocchi*, 439 F.2d 224, 169 USPQ at 370 (CCPA 1971). Applicants submit that no reasonable basis has been established. The Office Action fails to provide

any explanation why it doubts the truth or accuracy of any statement within the present application and also fails to provide any support for the rejection. The Office Action does not provide any facts, reasons, or evidence that lead the Examiner to conclude that the specification fails to teach how to make and use the claimed invention without undue experimentation, or that the scope of any enablement provided to one skilled in the art is not commensurate with the scope of protection sought by the claims.

Attorney for the Applicants contacted the Examiner on April 15, requesting some explanation to support this rejection and to identify the specific subject matter for which the Examiner feels is not adequately supported or explained within the specification. The Examiner was unable to provide such explanation to the Attorney and stated that Attorney may setup an interview to explain where the material in each claim is supported or that the Attorney could respond to the rejection in his remarks. Thus, Applicants, although knowing that there is no need to do so in this case, have below provided item numbers and identified at least one paragraph in which the subject matter of each limitation of each claim is described and in which enablement is provided. The subject matter may also be found in other paragraphs and Figures.

With respect to claim 1, for the limitations of a presenter software interface 62 displaying communication signals in a host compatible software language see paragraph [0027] of the present application and Figures 1-3.

With respect to claim 1, for the limitations of a presentation server 58 modifying the communication signals by performing a plurality of presenter chosen tasks via the presenter software interface 62 see paragraphs [0020], [0027], [0029], and [0044] of the present application and Figures 1-3.

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With respect to claim 1, for the limitations of two or more bi-directional client adapters 64 converting communication signals between the host compatible software language and two or more heterogeneous client type compatible software languages see paragraph [0020], [0027], [0030], and [0045] of the present application and Figure 3.

With respect to claim 1, for the limitations of one or more Internet data adapter(s) 70 directing the communication signals between 'the presenter software interface 62 and the two or more heterogeneous client types 16 via one or more Internet protocols see paragraphs [0018], [0027], and [0031] of the present application and Figure 3.

With respect to claim 2, for the limitations of the communication signals having a presentation signal, an instruction signal, a client type signal, or a response signal see paragraph [0018] of the present application.

With respect to claim 3, for the limitations of a an Internet data adapter manager 68 controlling transmission of the communication signals between the Internet data adapters 70 and the bi-directional client adapters 64 see paragraph [0031] of the present application and Figure 3.

With respect to claim 4, for the limitations of the Internet data adapters 70 directing communication signals between the presenter software interface 62 and the heterogeneous client types 16 see paragraphs [0018], [0027], and [0031] of the present application and Figures 1 and 3.

With respect to claim 5, for the limitations of the Internet protocols having a multicast transport, a unicast transport, a transmission control protocol, a low bandwidth protocol, point-to-point protocol, or a user datagram protocol see paragraph [0031] of the present application.

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With respect to claim 6, for the limitations of two or more heterogeneous client types 16 at two or more remote sites 26 see paragraph [0018] of the present application and Figure 1.

With respect to claim 6, for the limitations of a host site 15 having a presenter hardware interface 44 for communicating with the heterogeneous client types 16 see paragraph [0019] of the present application and Figure 1.

With respect to claim 6, for the limitations of a host site 15 having a controller 30 that includes a telecommunication control system 54 and electrically coupled to the presenter hardware interface 44 and transmitting presenter communication signals see paragraph [0020] of the present application.

With respect to claim 6, for the limitations of a high-speed data communication transport electrically coupled to the heterogeneous client types 16 and the host site 15, the high-speed data communication transport providing the heterogeneous client types 16 access to the presenter communication signals and communication between the host site 15 and the heterogeneous client types 16 see paragraphs [0018], [0025], [0031], and [0032] of the present application and Figure 1.

With respect to claim 7, for the limitation of the communication transport is an Internet 32 see paragraph [0018] of the present application and Figure 1.

With respect to claim 8, for the limitations of the Internet 32 is accessed through an Internet service provider, a network service provider, a corporate modem bank, a digital subscriber line, a satellite system, or a cable television network see paragraph [0034] of the present application.

With respect to claim 9, for the limitations of a presenter software interface 62 displaying communication signals in a host compatible software language see paragraph [0028] of the present application and Figures 1 and 3.

With respect to claim 9, for the limitations of a presentation server 58 modifying said communication signals by performing presenter chosen tasks via the presenter software interface 62 see paragraph [0044] of the present application.

With respect to claim 9, for the limitations of two or more bi-directional client adapters 64 converting communication signals between the host compatible software language and two or more heterogeneous client type compatible languages see paragraphs [0020], [0027], [0030], and [0045] of the present application and Figure 3.

With respect to claim 9, for the limitations of one or more Internet data adapter(s) 70 directing the communication signals between the presenter software interface 62 and the heterogeneous client types 16 via one or more Internet protocols see paragraphs [0018], [0027], and [0031] of the present application and Figure 3.

With respect to claim 10, for the limitations of a heterogeneous client type of the two or more client types 16 is incorporated within an Intranet see paragraph [0022] of the present application.

With respect to claim 11, for the limitations of a heterogeneous client type of the two or more client types 16 includes a very small aperture terminal interface see paragraph [0022] of the present application.

With respect to claim 12, for the limitations of a heterogeneous client type of the two or more client types 16 is incorporated within a Bluetooth network see paragraph [0023] of the present application.

With respect to claim 13, for the limitations of the heterogeneous client types 16 include two or more of a cellular phone, a computer, a personal digital assistant, a palm pilot, a scanner, a printer, a video camera, a telephone, or a facsimile machine see paragraphs [0022]-[0024] of the present application.

With respect to claim 14, for the limitations of a heterogeneous client type of the two or more client types 16 includes at least one of a microphone, a keyboard, a mouse, a video monitor, a LCD screen, a 7-segment display, or a computer see paragraph [0022] of the present application.

With respect to claim 15, for the limitations of a heterogeneous client type of the two or more client types 16 includes a video camera 50 that generates a remote site communication signal see paragraphs [0018]-[0020] and [0022]-[0023] of the present application and Figure 1.

With respect to claim 15, for the limitations of the host site 15 receiving the remote site communication signal via the telecommunication control system 54 see paragraphs [0020] and [0027] of the present application and Figures 1-2.

With respect to claim 16, for the limitations of a first client type is able to receive communication through the communication transport between the host site 15 and a second client type see paragraphs [0018], [0022], and [0037] of the present application.

With respect to claim 17, for the limitations of broadcasting presenter communication signals of a presenter 34 from a host site 15 see paragraph [0034] of the present application and Figures 1 and 4.

With respect to claim 17, for the limitations of establishing a communication connection between the host site 15 and two or more heterogeneous client types 16 via a communication transport see paragraph [0035] of the present application and Figure 1 and 4.

With respect to claim 17, for the limitations of receiving the presenter communication signals on the heterogeneous client types 16 see paragraph [0036] of the present application and Figure 1 and 4.

With respect to claim 17, for the limitations of a displaying or articulating a presenter communication signals on the heterogeneous client types 16 see paragraph [0037] of the present application and Figure 1 and 4.

With respect to claim 18, for the limitations of generating and transmitting remote site communication signals see paragraph [0038] of the present application and Figures 1 and 4.

With respect to claim 18, for the limitations of receiving the remote site communication signals on a presenter interface 44 at the host site 15 see paragraph [0039] of the present application and Figures 1 and 4.

With respect to claim 19, for the limitations of receiving communication between the host site 15 and a first client type at a first remote site by a second client type at a second remote site see paragraph [0036] of the present application and Figures 1 and 4.

With respect to claim 20, for the limitations of displaying communication signals on a presenter interface 44 see paragraph [0040] of the present application and Figures 1 and 5.

With respect to claim 20, for the limitations of modifying the communicational signals see paragraph [0044] of the present application and Figures 1 and 5.

With respect to claim 20, for the limitations of converting the communication signals between a host language and two or more heterogeneous client type languages see paragraph [0045] of the present application and Figures 1 and 5.

With respect to claim 20, for the limitations of time synchronizing the communication signals see paragraph [0046] of the present application and Figures 1 and 5.

With respect to claim 20, for the limitations of displaying the communication signals on multiple learning media at multiple remote locations see paragraph [0037] of the present application and Figures 1 and 4.

Applicants thus submit that the subject matter covered in each of the claims is clearly described and shown in the specification and accompanying Figures. Applicants are unaware of any subject matter claimed that is not adequately described. Applicants submit that the description provided for all of the subject matter claimed is such that one skilled in the art would find the specification enabling. Should the Examiner feel that there is subject matter or terms not adequately described, Applicants request that the Examiner specifically point out the subject matter or terms of concern and some explanation to support such feeling so that it may be addressed instead of blanketly stating that all the claims contain subject matter not adequately described.

Claim 4 stands rejected under 35 U.S.C. 112 for use of a trademark within a claim. Applicants have amended claim 4 to no longer include a trademark.

Claims 6 and 11 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Specifically the terms "high-speed" and "very small aperture" are not definite. Claim 6 is herein amended to remove the term "high-speed". With respect to claim 11, Applicants submit that no amendment is necessary. The term "very small aperture" is part of the term "very small aperture terminal", which has a specific identification and meaning in the art. A very small aperture terminal or VSAT refers to an earthbound station used in satellite communications of data, voice and video signals, excluding broadcast television. A VSAT is the communication medium that allows public or private institutions to send and /or receive information from their own "Personal Earth Station". A VSAT does not refer to any type of screen not used with a desktop computer, as suggested in the Office Action. A VSAT consists of two parts, a transceiver that

is placed outdoors in direct line of sight to a satellite and a device that is placed indoors to interface the transceiver with the end user's communications device, such as a personal computer. Although the term "very small" in and of itself may be indefinite in the abstract, the term "very small aperture terminal" is definite and refers to an earthbound station as described above.

Claims 1-20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Boys (U.S. Pub. No. 2002/0059373 A1) in view of Atkinson (U.S. Pub. No. 2001/0039571 A1).

Boys discloses an internet enabled subscription teaching service system. The system includes multiple lecture recipients 15 and a lecture service provider 17, which are connected to an ISP 20. The ISP 20 is in communication with multiple servers 19, 27, and 29 via an Internet. The servers 19, 27, and 29 are used to store information and contain HTML information.

With respect to claim 1, the Office Action states that Boys teaches a presentation server that modifies the communication signals by performing presenter chosen tasks via the presenter software interface. Applicants traverse, and submit that Boys does not teach a presentation server that modifies communication signals or a presentation server that performs the stated modification via a presenter software interface. In Boys a lecturer invokes software 35 within the lecture service provider 17 to create a lecture. The lecture is bundled using the software 35 and then sent to the Internet server 19. The server 19 stores the lecture and delivers the lecture at the appropriate time to the recipients 15. The delivery of the lecture is coordinated by another software 31 located within the server 19. The server 19 does no modify the lecture, but rather simply delivers it to the recipients 15. Also, the server 19 does not perform any task via the lecture service provider 17. Tasks performed by the server 19 are coordinated by the software 31 not by the lecture service provider 17 or the software 35. Notice that the lecture service provider 17 and the server 19 are

separately located, this is unlike the presentation server and the presentation software interface of the present application.

The Office Action further states that Boys teaches two or more client adaptors converting communication signals between said host compatible software language and two or more heterogeneous client type software languages. Applicants traverse. The Office Action admits that Boys fails to teach two or more heterogeneous client types. Applicants agree, and submit that since the later is not taught by Boys that clearly the former is also not taught by Boys. Since Boys fails to teach or suggest heterogeneous client types, Boys does not teach or suggest adaptors or any other device that converts communication signals between a host compatible software language and multiple heterogeneous client type software languages.

The Office Action also states that Boys teaches the directing of communication signals between said presenter software interface and said two or more heterogeneous client types via one or more Internet protocols. Applicants again traverse.

Applicants submit that since Boys admittedly fails to teach or suggest heterogeneous client types, Boys also fails to teach or suggest communication therewith and the associated devices necessary, such as the claimed Internet data adaptors, to perform communication therewith. The Internet data adaptors claimed allow communication signals to be transmitted to and received from heterogeneous client types, which often utilize different Internet protocols. Such an adaptor is not inherent, especially since the required use thereof is not necessary or required unless communication with heterogeneous client types exists.

The Office Action relies solely on Boys for the teaching of every limitation within claim 1 except heterogeneous client types for which it relies on Atkinson.

Applicants submit that merely teaching or disclosing multiple heterogeneous client types is not sufficient to establish obviousness, especially since such devices clearly exist in the art. Referring to MPEP 2143.01, the mere fact that references can be combined or modified does not render the resultant obvious unless the prior art also suggests the desirability thereof, *In re Mills,* 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990). There is no motivation provided in either reference for the combination and modification required thereof that would allow one to arrive at the claimed inventions.

Atkinson discloses a system that allows for the one-way transfer of media from a satellite 240, cable 246, and an Internet 252 through a media manager 200 to multiple passive devices, such as a jukebox, a speaker, a TV, a computer, a cell phone, and a PDA. The only interaction provided in Atkinson is between a cell phone, a PDA, and a commerce center 295. Note that this interaction is not performed using the Internet 252. The bi-directional communication claimed between multiple heterogeneous client types is not taught or suggested by Atkinson. There is no connection between the passive distribution of media to different devices of Atkinson and the teaching service system of Boys, and no object reason has been put forth for Applicants to believe otherwise.

The combination of Boys and Atkinson also does not allow one to arrive at the present invention without modification thereof. The passive distribution of Atkinson in combination with the teaching service of Boys does not teach the bi-directional communication between a presenter server having a host compatible language and multiple heterogeneous client types having associated compatible software languages. It is not clear how the system of Boys would be modified to incorporate the system of Atkinson. The modifications necessary are not taught or suggested and to assert otherwise, Applicants submit, would be the use of improper hindsight in view of the present application.

Thus, Applicants submit that Boys and Atkinson alone or in combination fail to teach or suggest a majority of the limitations recited in claim 1. Referring to MPEP 706.02(j) and 2143, to establish a *prima facie* case of obviousness the prior art reference(s) must teach or suggest all the claim limitations, see *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Therefore, claim 1 is novel, nonobvious, and is in a condition for allowance. Since claims 2-5 depend from claim 1, they are also novel, nonobvious, and are in a condition for allowance for at least the same reasons.

With respect to claim 6, the Office Action states that Boys-Atkinson teach a presenter hardware interface for communicating with the heterogeneous client types. As stated above, neither Boys nor Atkinson teach or suggest such communication. Boys discloses communication between a presenter interface and a single client type. Atkinson merely discloses different passive output devices. Different passive output devices are known and clearly do exist, but the communication therewith in an interactive learning environment was not known prior to the present application. The combination of the passive devices of Atkinson with the teaching system of Boys does not teach or suggest the communication claimed or the devices required to perform such communication.

Atkinson, like Boys, also fails to teach or suggest a communication transport providing communication between a host site and multiple heterogeneous client types. See arguments presented above.

With respect to claim 17, Applicants submit that both Boys and Atkinson fail to teach or suggest wirelessly broadcasting presenter communication signals and establishing a bi-directional communication connection between a host site and multiple heterogeneous client types. In review of the relied upon references one can clearly see that neither reference teaches or suggests wireless broadcasting and bi-directional communication with heterogeneous client types since the devices necessary for performing such tasks are not shown or

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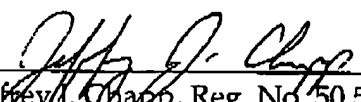
suggested. Thus, the relied upon art fails to teach or suggest each and every limitation of claim 17. Claim 17 is novel, nonobvious, and is in a condition for allowance. Since claims 18-19 depend from claim 17, they too are novel, nonobvious, and are in a condition for allowance for at least the same reasons.

With respect to claim 20, as stated above both references fails to teach or suggest converting communication signals between a host language and multiple heterogeneous client type languages. Thus, each and every element of claim 20 is also not taught or suggested. Therefore, claim 20 is also, novel, nonobvious, and is in a condition for allowance.

In light of the amendments and remarks, Applicants submit that all objections and rejections are now overcome. The Applicants have added no new matter to the application by these amendments. The application is now in condition for allowance and expeditious notice thereof is earnestly solicited. Should the Examiner have any questions or comments, he is respectfully requested to call the undersigned attorney.

Respectfully submitted,

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